

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARQUIS JACKSON, *et al.*,
Defendants

NO. CR24-164-JNW

[PROPOSED]

**PROTECTIVE ORDER
RESTRAINING CERTAIN
FORFEITABLE PROPERTY**

THIS MATTER comes before the Court on the United States' Motion for a Protective Order to Restrain Certain Forfeitable Property (the "Motion"), namely:

1. The following property, seized on or about October 2, 2024, from the residence of Defendant Marquis Jackson, located at 3016 SW Heights Ave., Conyers, Georgia (the “Conyers Premises”):
 - a. \$7,141.00 in United States currency;
 - b. One necklace;
 - c. One Richard Mille Watch;
 - d. One Glock pistol bearing no serial number, and associated magazines and ammunition;
 - e. One Glock 19, bearing serial number BVKD168, and associated magazines and ammunition;

- f. One Sig Sauer P365 pistol bearing serial number 66G287063, and associated magazines and ammunition;
- g. One Glock 17 pistol, bearing serial number BTND078, and associated magazines and ammunition;
- h. One Ruger 57 pistol, bearing serial number 64308758, and associated magazines and ammunition;
- i. One Smith & Wesson M&P 15 rifle, bearing serial number TM89411, and associated magazines and ammunition;
- j. One Glock 19 Gen 5 pistol, bearing serial number BYFM664, and associated magazines and ammunition;
- k. One Omni Hybrid American Tactical Multical 223/556 pistol, bearing serial number NS255287, and associated magazines and ammunition; and
- l. Any additional firearm parts and accessories, magazines, and ammunition;

The following property, seized on or about October 2, 2024, from the residence of Defendants Mandel Jackson, Matelita Jackson, Miracle Jackson, and Markell Jackson (part-time), located at 2411 SE 3rd St., Renton, Washington (“Subject Premises 1”):

- a. Miscellaneous jewelry, including:
 - i. One chain (broken);
 - ii. One diamond pendant;
 - iii. One Rolex, oyster perpetual date adjust watch, with aftermarket diamond bezel, reference #69173 26mm;
 - iv. One heart pendant with 18-inch long diamond chain;
 - v. One HIRA diamond pave pendant, GH color, Si1-Si2 clarity diamonds;

- vi. One 2.5-inch long, 5.5mm width, hollow rope chain (broken);
- vii. One 8-inch long, 3.4mm length, hollow wheat square bracelet;
- viii. One Rolex watch, Datejust, oyster perpetual movement, model #16200;
- ix. One Cuban link chain;
- x. Costume jewelry with fake stones;
- xi. One Rolex watch, Datejust, 18k gold, reference #228238, 14mm case diameter, 831148 band;
- xii. One Cuban link chain, 23-inch long, 1-inch width, with broken clasp; and
- xiii. One gold nugget ring; and

One Taurus PT 1 .45 Pro pistol bearing serial number ND095965, and associated magazine and ammunition;

the following property, seized on or about August 18, 2024, from defendant Edgar Valdez's residence, located at 2424 W. Pima Street, Phoenix, Arizona (the "Phoenix Premises"):

- Approximately \$25,000 in U.S. currency;
- Two Rolex watches, Datejust, oyster, perpetual, model #16233; Blue dial fake Rolex, model #126300, with real aftermarket diamonds; and
- One gold colored necklace.

the following property, seized on or about August 18, 2024, from a residence used by Defendant Edgar Valdez, located at 2618 S. 110th Drive, Avondale, Arizona (the "Avondale Premises"):

- One black Ruger LCP .380 handgun, bearing serial number 381363684, and associated magazines and ammunition;

- 1 5. The following property, seized on or about August 18, 2024, from a 2018
- 2 Hyundai Elantra VIN: 5NPD84LF3JH369697, registered to an individual
- 3 with the initials M.D.J.C.R., and in the possession of Defendant Edgar
- 4 Valdez (the “Elantra”):
 - 5 a. \$20,802.00 in United States currency;
- 6 6. The following property, seized on or about October 2, 2024, from the
- 7 residence of Defendant Sir Terrique Milam, located at 31408 28th Ave. S,
- 8 F103, Federal Way, Washington (“Subject Premises 2”):
 - 9 a. \$11,556.00 in United States currency; and
 - 10 b. Three magazines and assorted ammunition;
- 11 7. The following property, seized on or about October 2, 2024, from the
- 12 residence of Defendants Robert Johnson and Adean Batinga, located at 510
- 13 Stevens Ave. SW, Apt. S206, Renton, Washington 98057 (“Subject
- 14 Premises 7”):
 - 15 a. One Century Arms Micro Draco Pistol, bearing serial number
 - 16 21PMD-23604, and associated magazines and ammunition; and
 - 17 b. Any additional magazines and ammunition;
- 18 8. The following property seized on or about October 2, 2024, from a
- 19 residence associated with Defendant Adean Batinga, located at 11610 26th
- 20 Ave. S, Burien, Washington (“Subject Premises 5”):
 - 21 a. One onyx ring;
 - 22 b. One letter A signet ring;
 - 23 c. One 8-inch long rope chain bracelet (broken); and
 - 24 d. One 6-inch long chain;
- 25 9. The following property seized on or about October 2, 2024, from the
- 26 residence of Defendant Chad Conti, located at 14011 SE 177th St., Apt
- 27 P104, Renton, Washington (“Subject Premises 4”):

- a. \$4,110 in United States currency;
- b. One Taurus PT145 Pro Semi-Auto pistol, bearing serial number NZH73467, and associated magazines and ammunition;
- c. One Red and Silver Semi-Auto pistol, bearing serial number AE27337, and associated magazines and ammunition; and
- d. Any assorted magazines and ammunition.

7 The Court, having reviewed the papers and pleadings filed in this matter, including
8 the United States' Motion and the supporting Declaration of Federal Bureau of
9 Investigation Special Agent Brian Crist, hereby FINDS entry of a protective order
10 restraining the above-identified property (collectively, "the Subject Property") is
11 appropriate because:

- The United States gave notice of its intent to pursue forfeiture in the Indictment returned on September 25, 2024 (Dkt. No. 1), the Superseding Indictment returned on October 10, 2024 (Dkt. No. 128), and in the Forfeiture Bill of Particulars (Dkt. No. 302);
- Based on the facts set forth in the Declaration of Special Brian Crist, there is probable cause to believe the Subject Property may, upon the Defendants' conviction, be forfeited in this case, pursuant to 21 U.S.C. § 853(a) as proceeds or property derived from proceeds and/or as facilitating property, of the charged *Conspiracy to Distribute Controlled Substances*; and,
- To ensure the Subject Property remains available for forfeiture, its continued restraint pursuant to 21 U.S.C. § 853(e)(1) is appropriate.

NOW, THEREFORE, THE COURT ORDERS:

26 1. The United States' request for a protective order restraining the Subject
27 Property pending the conclusion of this case is GRANTED; and,

1 2. The Property shall remain in the custody of the United States, and/or its
2 authorized agents or representatives, pending the conclusion of this criminal case, to
3 include any ancillary forfeiture proceedings, and/or further order of the Court.

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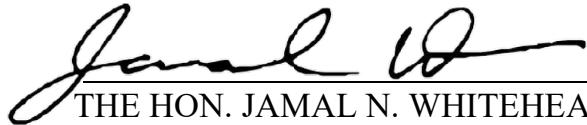
5 IT IS SO ORDERED.

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7 DATED this 19th day of March, 2025.

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THE HON. JAMAL N. WHITEHEAD
UNITED STATES DISTRICT JUDGE

11 Presented by:

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